PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM(S)

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

:

Debtors. : (Jointly Administered)

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NOTICE OF DEBTORS' TWENTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS (Incorrectly Classified Claims)

PLEASE TAKE NOTICE that on July 2, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "Debtors"), filed their twenty-eighth omnibus objection to reclassify certain claims (the "Twenty-Eighth Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Twenty-Eighth Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States

Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New

York 10004, on **August 6, 2010 at 9:45 a.m.** (**Eastern Time**), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE TWENTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT "A" ANNEXED THERETO.

PLEASE TAKE FURTHER NOTICE that any responses to the Twenty-Eighth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael

J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **July 30, 2010** at 4:00 p.m. (Eastern Time) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Twenty-Eighth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Twenty-Eighth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York July 2, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153

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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

:

Debtors. : (Jointly Administered)

:

<u>DEBTORS' TWENTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS</u> (Incorrectly Classified Claims)

THIS OBJECTION SEEKS TO RECLASSIFY CERTAIN FILED PROOFS OF CLAIM.

CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE

EXHIBIT ANNEXED TO THIS OBJECTION.

TO THE HONORABLE ROBERT E. GERBER, UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) ("**MLC**") and its affiliated debtors, as debtors in possession (collectively, the "**Debtors**"), respectfully represent:

Relief Requested

- 1. The Debtors file this Twenty-Eighth omnibus objection to certain claims (the "Twenty-Eighth Omnibus Objection to Claims") pursuant to section 502(b) of title 11, United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 4180], seeking entry of an order reclassifying the claims listed on Exhibit "A" annexed hereto so that they are in accordance with the Bankruptcy Code. 1
- 2. The Debtors have examined the proofs of claim identified on Exhibit "A" hereto and have determined that the proofs of claim listed under the heading "Claims to be Reclassified" (collectively, the "Incorrectly Classified Claims") are claims that are not entitled to administrative and/or priority status under any of the subsections of section 507(a) of the Bankruptcy Code.

Jurisdiction

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors' bankruptcy estates on the Debtors' claims register on the website maintained by the Debtors' claims agent, www.motorsliquidation.com. A link to the claims register is located under the "Claims Information" tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

Background

- 4. On June 1, 2009, four of the Debtors (the "Initial Debtors")² commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the "Realm/Encore Debtors")³ commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.
- 5. On September 16, 2009, this Court entered an order [Docket No. 4079] establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors' cases, including governmental units. On December 2, 2009, this Court entered an order [Docket No. 4586] establishing February 1, 2010 as the deadline for each person or entity to file a proof of claim in the Realm/Encore Debtors' cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim).
- 6. Furthermore, on October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

The Relief Requested Should Be Approved by the Court

- 7. A filed proof of claim is "deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). If an objection refuting at least one of the claim's essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009), *aff'd*, No. 09 Civ. 2229 (DC), 2010 WL 234827 (S.D.N.Y. Jan. 22, 2010); *In re Adelphia Commc'ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660, at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1).
- 8. The Debtors have reviewed and determined that each Incorrectly Classified Claim is not properly asserted as an administrative and/or priority claim for the reasons indicated in the "Note" below each Incorrectly Classified Claim listed on Exhibit "A." The Incorrectly Classified Claims (i) are not on account of obligations owed on goods received by a Debtor within 20 days before such Debtor commenced its chapter 11 case and/or (ii) are not entitled to priority status under any of the subsections of section 507(a) of the Bankruptcy Code. Accordingly, the Debtors request that the Court enter an order reclassifying the administrative and/or priority portions of each Incorrectly Classified Claim as indicated on Exhibit "A."

Notice

9. Notice of this Twenty-Eighth Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Third Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated April 29, 2010 [Docket No. 5670].

10. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York July 2, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

09-50026-mg Doc 6251 Filed 07/02/10 Entered 07/02/10 17:03:57 Main Document HEARING DATE AND TAME: August 6, 2010 at 9:45 a.m. (Eastern Time)

RESPONSE DEADLINE: July 30, 2010 at 4:00 p.m. (Eastern Time)

UNITED STATES BANKRUPTCY COU	JRT
SOUTHERN DISTRICT OF NEW YOR	K

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

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ORDER GRANTING DEBTORS' TWENTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS (Incorrectly Classified Claims)

Upon the twenty-eighth omnibus objection to reclassify certain claims, dated July 2, 2010 (the "Twenty-Eighth Omnibus Objection to Claims"), of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11, United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 4180], seeking entry of an order reclassifying the Incorrectly Classified Claims on the grounds that each Incorrectly Classified Claim was incorrectly classified by the claimant, all as more fully described in the Twenty-Eighth Omnibus Objection to Claims; and due and proper notice of the Twenty-Eighth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Twenty-Eighth Omnibus Objection to Claims is in the

Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Twenty-Eighth Omnibus Objection to Claims.

09-50026-mg Doc 6251 Filed 07/02/10 Entered 07/02/10 17:03:57 Main Document

Pa 11 of 20

best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal

and factual bases set forth in the Twenty-Eighth Omnibus Objection to Claims establish just

cause for the relief granted herein; and after due deliberation and sufficient cause appearing

therefor, it is

ORDERED that the relief requested in the Twenty-Eighth Omnibus Objection to

Claims is granted to the extent provided herein; and it is further

ORDERED that each "Claim Amount and Priority" listed on Exhibit "A"

annexed hereto is hereby reclassified as indicated on Exhibit "A" under the column "Modified

Priority Status/Reduced Amount;" and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the

validity, allowance, or disallowance of, and all rights to object on any basis are expressly

reserved with respect to, any claim listed on Exhibit "A" annexed to the Twenty-Eighth Omnibus

Objection to Claims under the heading "Claims to be Reclassified" that is not reclassified; and it

is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to this Order.

Dated: New York, New York _____, 2010

United States Bankruptcy Judge

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Twenty-Eighth Omnibus Objection

Motors Liquidation Company, et al. Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Claim Amount ar Priority (1)	ıd	Modified Priorit Status/Reduced An		Grounds For Objection	Objection Page Reference
ACUMENT GLOBAL TECHNOLOGIES INC	60693	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly	Pgs. 1-5
ATTN: JOHN R CLARK 340 W LONG LAKE RD STE 450		Liquidation Company	\$0.00	(A)	\$0.00	(A)	Classified Claim	
FROY, MI 48098			\$46,390.90	(P)	\$0.00	(P)		
			\$0.00	(U)	\$46,390.90	(U)		
Official Claim Date: 11/27/2009			\$46,390.90	(T)	\$46,390.90	(T)		
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified			nt under section 507 of	the Ban	ıkruptcy			
CITY OF TORRANCE	9596	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly	Pgs. 1-5
3031 TORRANCE BLVD		Liquidation Company	\$0.00	(A)	\$0.00	(A)	Classified Claim	
FORRANCE, CA 90503			\$625.00	(P)	\$0.00	(P)		
			\$0.00	(U)	\$625.00	(U)		
			\$625.00 ut under section 507 of		\$625.00	(T)		
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC				f the Ban		(S)	Incorrectly Classified Claim	Pgs. 1-5
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 744907 KIWI ST	as a general ur	Motors Liquidation	\$0.00 \$0.00	f the Ban	s0.00	(S) (A)	Classified	Pgs. 1-5
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 744907 KIWI ST	as a general ur	Motors Liquidation	\$0.00 \$0.00	(S) (A) (P)	\$0.00 \$0.00	(S) (A) (P)	Classified	Pgs. 1-5
Official Claim Date: 10/14/2009 Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 744907 KIWI ST KAILUA KONA, HI 96740 Official Claim Date: 10/30/2009	as a general ur	Motors Liquidation	\$0.00 \$0.00 \$370,637.00	(S) (A) (P) (U)	\$0.00 \$0.00 \$0.00	(S) (A) (P) (U)	Classified	Pgs. 1-5
Note: This claim is for services performed prepetition and in Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 744907 KIWI ST KAILUA KONA, HI 96740	as a general un 18083	Motors Liquidation Company	\$0.00 \$0.00 \$370,637.00 \$370,637.00	(S) (A) (P) (U) (T)	\$0.00 \$0.00 \$0.00 \$370,637.00	(S) (A) (P) (U)	Classified	Pgs. 1-5
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK (44907 KIWI ST KAILUA KONA, HI 96740 Official Claim Date: 10/30/2009 Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified COMPUTER ASSOCIATES INTERNATIONAL, INC.	as a general un 18083	Motors Liquidation Company p priority treatments secured claim. Motors	\$0.00 \$0.00 \$370,637.00 \$370,637.00	(S) (A) (P) (U) (T)	\$0.00 \$0.00 \$0.00 \$370,637.00	(S) (A) (P) (U) (T)	Classified Claim	Pgs. 1-5
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 44907 KIWI ST KAILUA KONA, HI 96740 Official Claim Date: 10/30/2009 Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified COMPUTER ASSOCIATES INTERNATIONAL, INC. ALTINUM TECHNOLOGY INTERNATIONAL, INC.	as a general un 18083 is not entitled to as a general un	Motors Liquidation Company popriority treatments assecured claim.	\$0.00 \$0.00 \$370,637.00 \$370,637.00	(S) (A) (P) (U) (T) f the Ban	\$0.00 \$0.00 \$0.00 \$370,637.00 \$370,637.00	(S) (A) (P) (U) (T)	Classified Claim	
Note: This claim is for services performed prepetition and in Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 244907 KIWI ST KAILUA KONA, HI 96740 Official Claim Date: 10/30/2009	as a general un 18083 is not entitled to as a general un	Motors Liquidation Company priority treatmen assecured claim. Motors Liquidation	\$0.00 \$0.00 \$370,637.00 \$370,637.00 \$1 under section 507 of	(S) (A) (P) (U) (T) f the Ban (S) (A)	\$0.00 \$0.00 \$0.00 \$370,637.00 \$370,637.00 akruptcy	(S) (A) (P) (U) (T)	Classified Claim Incorrectly Classified	
Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified CLARK AUTOMOTIVE GROUP, INC ALLAN C CLARK 244907 KIWI ST KAILUA KONA, HI 96740 Official Claim Date: 10/30/2009 Note: This claim is for services performed prepetition and i Code. Accordingly, this claim should be reclassified COMPUTER ASSOCIATES INTERNATIONAL, INC. PLATINUM TECHNOLOGY INTERNATIONAL, INC. ATTN ROBERT AUSTEN	as a general un 18083 is not entitled to as a general un	Motors Liquidation Company priority treatmen assecured claim. Motors Liquidation	\$0.00 \$0.00 \$370,637.00 \$370,637.00 \$10.00 \$0.00 \$0.00	(S) (A) (P) (U) (T) f the Ban (S) (A) (P)	\$0.00 \$0.00 \$0.00 \$370,637.00 \$370,637.00 skruptcy	(S) (A) (P) (U) (T) (S) (A) (P)	Classified Claim Incorrectly Classified	

unsecured claim. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Twenty-Eighth Omnibus Objection

Motors Liquidation Company, et al. Case No. 09-50026 (REG), Jointly Administered

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Name and Address of Claimant	Claim #	Debtor	Claim Amount ar Priority (1)	ıd	Modified Priorit Status/Reduced Am		Grounds For Objection	Objection Pag Reference
CONSTRUCTION USERS ROUNDTABLE	4523	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly Classified	Pgs. 1-5
1100 EXECUTIVE PARK DR STE 210		Liquidation Company	\$11,000.00	(A)	\$0.00	(A)	Claim	
CINCINNATI, OH 45241			\$0.00	(P)	\$0.00	(P)		
			\$0.00	(U)	\$11,000.00	(U)		
Official Claim Date: 10/5/2009			\$11,000.00	(T)	\$11,000.00	(T)		
Note: This claim is for pre-petition membership services code. Accordingly, this claim should be reclassified			e expense treatment un	ider the	Bankruptcy			
MULLINS MOTORS INC	63959	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly Classified	Pgs. 1-5
C/O CARL MEARES PO BOX 187		Liquidation Company	\$0.00	(A)	\$0.00	(A)	Claim	
FAIR BLUFF, NC 28439			\$2,566,000.00	(P)	\$0.00	(P)		
			\$0.00	(U)	\$2,566,000.00	(U)		
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(s	g) the Bankruptcy	y Code this claim	is only entitled to a no	states no		(T)		
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(gunsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD WILLIAM G BRENNAN, EXECUTIVE DIRECTOR	g) the Bankruptcy	y Code this claim	perty of the Debtors' es	states no on-prior	or is it	(S)	Incorrectly Classified Claim	Pgs. 1-5
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(g unsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD VILLIAM G BRENNAN, EXECUTIVE DIRECTOR 507 - 21ST ST, SUITE 330	g) the Bankruptcy e reclassified as a	y Code this claim n non-priority, gen Motors Liquidation	perty of the Debtors' es is only entitled to a no eral unsecured claim. \$0.00	(S)	or is it ity, general \$0.00	(S) (A)	Classified	Pgs. 1-5
	g) the Bankruptcy e reclassified as a	y Code this claim n non-priority, gen Motors Liquidation	perty of the Debtors' es is only entitled to a no ieral unsecured claim. \$0.00	(S) (A) (P)	sor is it ity, general \$0.00	(S) (A) (P)	Classified	Pgs. 1-5
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(g unsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD WILLIAM G BRENNAN, EXECUTIVE DIRECTOR 1507 - 21ST ST, SUITE 330	g) the Bankruptcy e reclassified as a	y Code this claim n non-priority, gen Motors Liquidation	perty of the Debtors' es is only entitled to a no ieral unsecured claim. \$0.00 \$0.00 \$66,814.15	(S) (A) (P)	\$0.00 \$0.00 \$0.00	(S) (A) (P) (U)	Classified	Pgs. 1-5
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(g unsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD WILLIAM G BRENNAN, EXECUTIVE DIRECTOR 507 - 21ST ST, SUITE 330 6ACRAMENTO, CA 95811 Official Claim Date: 6/5/2009	g) the Bankrupter e reclassified as a 249	y Code this claim n non-priority, gen Motors Liquidation Company	specification of the Debtors' estimated to a noteral unsecured claim. \$0.00 \$0.00 \$66,814.15 \$0.00 \$66,814.15	(S) (A) (P) (U) (T)	\$0.00 \$0.00 \$0.00 \$66,814.15	(S) (A) (P) (U)	Classified	Pgs. 1-5
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(gunsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD WILLIAM G BRENNAN, EXECUTIVE DIRECTOR 507 - 21ST ST, SUITE 330 SACRAMENTO, CA 95811 Official Claim Date: 6/5/2009 Note: This claim is for services performed prepetition and Code. Accordingly, this claim should be reclassifice.	g) the Bankrupter e reclassified as a 249	y Code this claim n non-priority, gen Motors Liquidation Company p priority treatmer assecured claim. Motors	specification of the Debtors' estimated to a noteral unsecured claim. \$0.00 \$0.00 \$66,814.15 \$0.00 \$66,814.15	(S) (A) (P) (U) (T)	\$0.00 \$0.00 \$0.00 \$66,814.15	(S) (A) (P) (U) (T)	Classified Claim	Pgs. 1-5
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(gunsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD VILLIAM G BRENNAN, EXECUTIVE DIRECTOR 507 - 21ST ST, SUITE 330 ACRAMENTO, CA 95811 Official Claim Date: 6/5/2009 Note: This claim is for services performed prepetition and Code. Accordingly, this claim should be reclassified EECO LLC	249 1 is not entitled to day a general un	y Code this claim n non-priority, gen Motors Liquidation Company	sperty of the Debtors' est is only entitled to a noteral unsecured claim. \$0.00 \$0.00 \$66,814.15 \$0.00 \$66,814.15	(S) (A) (P) (U) (T) the Ba	\$0.00 \$0.00 \$0.00 \$66,814.15 \$66,814.15	(S) (A) (P) (U) (T)	Classified Claim	, , , , , , , , , , , , , , , , , , ,
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(g unsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD WILLIAM G BRENNAN, EXECUTIVE DIRECTOR 1507 - 21ST ST, SUITE 330 SACRAMENTO, CA 95811 Official Claim Date: 6/5/2009	249 1 is not entitled to day a general un	y Code this claim n non-priority, gen Motors Liquidation Company p priority treatmer assecured claim. Motors Liquidation	sperty of the Debtors' es is only entitled to a no eral unsecured claim. \$0.00 \$0.00 \$66,814.15 \$0.00 \$66,814.15 at under section 507 of	(S) (A) (P) (U) (T) (S)	\$0.00 \$0.00 \$0.00 \$66,814.15 \$66,814.15	(S) (A) (P) (U) (T)	Classified Claim	
Note: This claim arises from the rejection of an executory entitled to priority status. Pursuant to section 502(g unsecured claim. Accordingly, this claim should be NEW MOTOR VEHICLE BOARD WILLIAM G BRENNAN, EXECUTIVE DIRECTOR 1507 - 21ST ST, SUITE 330 SACRAMENTO, CA 95811 Official Claim Date: 6/5/2009 Note: This claim is for services performed prepetition and Code. Accordingly, this claim should be reclassified RECO LLC RECO 1008 SEABROOK WAY	249 1 is not entitled to day a general un	y Code this claim n non-priority, gen Motors Liquidation Company p priority treatmer assecured claim. Motors Liquidation	sperty of the Debtors' es is only entitled to a no peral unsecured claim. \$0.00 \$0.00 \$66,814.15 \$0.00 \$66,814.15 at under section 507 of \$0.00 \$0.00	(S) (A) (P) (U) (T) (S) (A) (P) (H) (P) (O) (P) (O) (P)	\$0.00 \$0.00 \$0.00 \$66,814.15 \$66,814.15 nkruptcy	(S) (A) (P) (U) (T) (S) (A) (P)	Classified Claim	, , , , , , , , , , , , , , , , , , ,

Bankruptcy Code. Accordingly, this claim should be reclassified as a general unsecured claim.

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Twenty-Eighth Omnibus Objection

09-50026-mg Doc 6251 Filed 07/02/10 Entered 07/02/10 17:03:57

Pg 14 of 20 Exhibit A

Main Document

Name and Address of Claimant	Claim#	Debtor	Claim Amount a Priority (1)	nd	Modified Priorit Status/Reduced An		Grounds For Objection	Objection Pag Reference
TAMMY WHITE	62834	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly	Pgs. 1-5
4870 E SHASTA ST		Liquidation Company	\$0.00	(A)	\$0.00	(A)	Classified Claim	
LAREMORE, OK 74017			\$2,000.00	(P)	\$0.00	(P)		
			\$0.00	(U)	\$2,000.00	(U)		
			** ***	(TE)	\$2,000.00	(T)		
Official Claim Date: 11/28/2009 Note: This claim arises from litigation against the D expense pursuant to section 503(b)(9) of the E general unsecured claim.				d an adn	ninistrative	(1)		
ote: This claim arises from litigation against the D expense pursuant to section 503(b)(9) of the E general unsecured claim.			s, and it is not entitled	d an adn ied as a	ninistrative		Incorrectly	Pgs. 1-5
ote: This claim arises from litigation against the D expense pursuant to section 503(b)(9) of the E	Bankruptcy Code. Acc	cordingly, this clain	s, and it is not entitled m should be reclassif	d an adnied as a	ninistrative non-priority,	(S)	Incorrectly Classified Claim	Pgs. 1-5
ote: This claim arises from litigation against the D expense pursuant to section 503(b)(9) of the E general unsecured claim. AYLOR, HERB 74 MOSS LANDING DR	Bankruptcy Code. Acc	ordingly, this clain Motors Liquidation	s, and it is not entitled m should be reclassif	d an adnied as a (S) (A)	ninistrative non-priority, \$0.00	(S) (A)	Classified	Pgs. 1-5
ote: This claim arises from litigation against the D expense pursuant to section 503(b)(9) of the E general unsecured claim. AYLOR, HERB	Bankruptcy Code. Acc	ordingly, this clain Motors Liquidation	s, and it is not entitled in should be reclassif \$0.00	d an adnied as a (S) (A)	ninistrative non-priority, \$0.00	(S) (A) (P)	Classified	Pgs. 1-5

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Pg 15 of 20 Exhibit A

Twenty-Eighth Omnibus Objection

general unsecured claim.

						_		
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	I Modified Priori Status/Reduced Ar		Grounds For Objection	Objection Pag Reference	
THE TRAVELERS INDEMNITY COMPANY AND	59309	MLCS Distribution	\$0.00 (S) \$0.00	(S)	Incorrectly Classified	Pgs. 1-5	
MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP		Corporation	\$0.00 (2	A) \$0.00	(A)	Claim		
500 CAMPUS DRIVE			\$15,000.00 (P) \$0.00	(P)			
			\$0.00 (U) \$15,000.00	(U)			
Official Claim Date: 11/27/2009			\$15,000.00 (T) \$15,000.00	(T)			
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankru general unsecured claim.								
THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES	59310	MLCS, LLC	\$0.00 (S) \$0.00	(S)	Incorrectly Classified	Pgs. 1-5	
MICHAEL P POMPEO			\$0.00 (A) \$0.00	(A)	Claim		
DRINKER BIDDLE & REATH LLP 500 CAMPUS DRIVE			\$15,000.00 (P) \$0.00	(P)			
FLORHAM PARK, NJ 07932			\$0.00 (U) \$15,000.00	(U)			
			\$15,000.00 (T) \$15,000.00	(T)			
			, and it is not entitled a	ın administrative	(-)			
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES			s, and it is not entitled a n should be reclassified \$0.00 (a	in administrative I as a non-priority, S) \$0.00	(S)	Incorrectly Classified Claim	Pgs. 1-5	
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP	iptcy Code. Ac	ccordingly, this clair	s, and it is not entitled a n should be reclassified	an administrative d as a non-priority, S) \$0.00 A) \$0.00	(S) (A)		Pgs. 1-5	
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankru general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP 500 CAMPUS DRIVE	iptcy Code. Ac	ccordingly, this clair	s, and it is not entitled a n should be reclassified \$0.00 (a \$0.00 (a	an administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00	(S) (A) (P)	Classified	Pgs. 1-5	
	iptcy Code. Ac	ccordingly, this clair	\$0.00 (A \$15,000.00 (C)	n administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00 U) \$15,000.00	(S) (A) (P) (U)	Classified	Pgs. 1-5	
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP 500 CAMPUS DRIVE FLORHAM PARK, NJ 07932	59311 5 It is not entit	MLC of Harlem, Inc.	\$0.00 (0.000) \$15,000.00 (0.000)	n administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00 U) \$15,000.00 T) \$15,000.00	(S) (A) (P) (U)	Classified	Pgs. 1-5	
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankru general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP 500 CAMPUS DRIVE FLORHAM PARK, NJ 07932 Official Claim Date: 11/27/2009 Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankru	59311 5 It is not entit	MLC of Harlem, Inc.	\$0.00 (0.000) \$15,000.00 (0.000)	an administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00 U) \$15,000.00 T) \$15,000.00 an administrative d as a non-priority,	(S) (A) (P) (U) (T)	Classified Claim	Pgs. 1-5	
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankru general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP 1000 CAMPUS DRIVE FLORHAM PARK, NJ 07932 Official Claim Date: 11/27/2009 Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankru general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO	59311 5. It is not entit uptcy Code. According to the content of	MLC of Harlem, Inc. led to priority status ecordingly, this clair Motors	\$0.00 (0 \$0.00 (0 \$15,000.00 (an administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00 U) \$15,000.00 T) \$15,000.00 an administrative d as a non-priority, S) \$0.00	(S) (A) (P) (U) (T)	Classified Claim		
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP 600 CAMPUS DRIVE FLORHAM PARK, NJ 07932 Official Claim Date: 11/27/2009 Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND	59311 5. It is not entit uptcy Code. According to the content of	MLC of Harlem, Inc. led to priority status coordingly, this clair Motors Liquidation	\$0.00 (as and it is not entitled a new should be reclassified \$0.00 (as 15,000.00 (cs)). The should be reclassified an should be reclassified \$0.00 (cs).	n administrative 1 as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00 U) \$15,000.00 T) \$15,000.00 an administrative 1 as a non-priority, S) \$0.00 A) \$0.00	(S) (A) (P) (U) (T)	Classified Claim		
Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP 500 CAMPUS DRIVE FLORHAM PARK, NJ 07932 Official Claim Date: 11/27/2009 Note: This claim arises from litigation against the Debtors expense pursuant to section 503(b)(9) of the Bankri general unsecured claim. THE TRAVELERS INDEMNITY COMPANY AND AFFILIATES MICHAEL P POMPEO DRINKER BIDDLE & REATH LLP	59311 5. It is not entit uptcy Code. According to the content of	MLC of Harlem, Inc. led to priority status coordingly, this clair Motors Liquidation	\$0.00 (0 \$15,000	n administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00 U) \$15,000.00 T) \$15,000.00 In administrative d as a non-priority, S) \$0.00 A) \$0.00 P) \$0.00	(S) (A) (P) (U) (T) (S) (A) (P)	Classified Claim		

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Pg 16 of 20 Exhibit A

Motors Liquidation Company, et al. Case No. 09-50026 (REG), Jointly Administered

Twenty-Eighth Omnibus Objection

CLAIMS TO BE RECLASSIFIED Name and Address of Claimant **Objection Page** Claim# Debtor Claim Amount and **Modified Priority Grounds For** Priority (1) Status/Reduced Amount Objection Reference Pgs. 1-5 TILLER, LARRY \$0.00 (S) Incorrectly 12099 \$0.00 (S) Motors Classified PO BOX 2824 Liquidation Company \$0.00 (A) \$0.00 (A) Claim \$350,000.00 (P) \$0.00 (P) SHOW LOW, AZ 85902 \$0.00 (U) \$350,000.00 (U) Official Claim Date: 10/19/2009 \$350,000.00 (T) \$350,000,00 (T) Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, and it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim. Pgs. 1-5 TUCKER, ERIC \$0.00 (S) Incorrectly 48441 \$0.00 (S) Motors Classified 6551 WARNER AVE APT 2 Liquidation \$0.00 (A) \$0.00 (A) Claim Company \$0.00 (P) \$8,475.00 (P) HUNTINGTON BEACH, CA 92647 \$0.00 (U) \$8,475.00 (U) Official Claim Date: 11/25/2009 \$8,475.00 (T) \$8,475.00 (T) Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, and it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim. TURNER BROADCASTING SYSTEM INC AND/OR \$0.00 (S) \$0.00 (S) Incorrectly Pgs. 1-5 46619 Motors AND RELEVANT SUBSIDIARIES Classified Liquidation \$0.00 (A) Claim C/O TIFFANY STRELOW COBB \$0.00 (A) Company VORYS, SATER, SEYMOUR AND PEASE LLP \$438,503.22 (P) \$0.00 (P) 52 EAST GAY STREET \$0.00 (U) \$438,503.22 (U) Official Claim Date: 11/25/2009 \$438,503.22 (T) \$438,503.22 (T)

This claim is for services performed prepetition and is not entitled to priority treatment under section 507 of the Bankruptcy Code. Accordingly, this claim should be reclassified as a general unsecured claim.

UWC STRATEGIC SERVICES	2577	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly Classified	Pgs. 1-5
ON UNEMPLOYMENT & WORK COMP 910 17TH ST NW STE 315		Liquidation Company	\$11,045.00	(A)	\$0.00	(A)	Claim	
WASHINGTON, DC 20006			\$0.00	(P)	\$0.00	(P)		
			\$0.00	(U)	\$11,045.00	(U)		
Official Claim Date: 10/2/2009			\$11,045.00	(T)	\$11,045.00	(T)		

This claim is for services performed prepetition and is not entitled to priority treatment under section 507 of the Bankruptcy Code. Accordingly, this claim should be reclassified as a general unsecured claim.

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Twenty-Eighth Omnibus Objection

Claim # 45120	Motors Liquidation Company	Claim Amount a Priority (1) \$0.00	(S)	Modified Priority Status/Reduced Am \$0.00	(S)	Grounds For Objection Incorrectly Classified	Objection Page Reference
45120	Liquidation	\$0.00	. ,			Classified	Pgs. 1-5
			(A)	\$0.00	(A)		
				Ψ0.00	(A)	Claim	
		\$3,831.44	(P)	\$0.00	(P)		
		\$0.00	(U)	\$3,831.44	(U)		
		\$3,831.44	(T)	\$3,831.44			
5382	Motors Liquidation	\$0.00	(S)	\$0.00	(S)	Incorrectly Classified	Pgs. 1-5
	Company	\$0.00	(A)	\$0.00	(A)	Claim	
		\$50,000.00	(P)	\$0.00	(P)		
		\$0.00	(U)	\$50,000.00	(U)		
		\$50,000.00	(T)	\$50,000.00	(T)		
22236	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly	Pgs. 1-5
22230	Liquidation					Classified Claim	<i>9</i>
	r y	\$4,500.00	(P)	\$0.00	(P)		
		\$0.00	(U)				
		im should be reclassif	fied as a	n non-priority,			
20739	Motors Liquidation	\$0.00	(S)	\$0.00	(S)	Incorrectly Classified	Pgs. 1-5
	Company	\$3,200.00	(A)	\$0.00	(A)	Claim	
		\$0.00	(P)	\$0.00	(P)		
		\$0.00	(U)	\$3,200.00	(U)		
i	is not entitle / Code. Acc	is not entitled to priority statu Code. Accordingly, this clair is not entitled to priority statu Code. Accordingly, this clair 22236 Motors Liquidation Company is not entitled to priority statu Code. Accordingly, this clair 20739 Motors Liquidation	Motors \$0.00 Liquidation Company \$50,000.00 \$50,000.00 \$50,000.00 \$50,000.00 \$50,000.00 \$50,000.00 \$22236 Motors \$0.00 Liquidation Company \$0.00 \$4,500.00 \$4,500.00 \$10.00 \$4,500.00 \$10.00	Motors Liquidation Company \$50,000.00 (P) \$0.00 (U) \$50,000.00 (T) is not entitled to priority status, and it is not entitled an aday Code. Accordingly, this claim should be reclassified as a Company \$4,500.00 (P) \$0.00 (C) \$10.00 (C) \$22236 Motors Liquidation Company \$4,500.00 (C) \$10.00 (C)	Liquidation Company \$0.00 (A) \$0.00 \$50,000.00 (P) \$0.00 \$0.00 (U) \$50,000.00 \$50,000.00 (T) \$50,000.00 \$50,000.00 (S) \$0.00 Liquidation Company \$0.00 (A) \$0.00 \$4,500.00 (P) \$0.00 \$4,500.00 (T) \$4,500.00 \$50,00 (T) \$50,000 \$50,00	Code. Accordingly, this claim should be reclassified as a non-priority. Solution So	Code. Accordingly, this claim should be reclassified as a non-priority.

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Twenty-Eighth Omnibus Objection

		CLAIMS T										
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	d Modified Prior Status/Reduced A		Grounds For Objection	Objection Page Reference					
WASHINGTON, LEE IRA	9127	Motors	\$0.00 ((S) \$0.0) (S)	Incorrectly	Pgs. 1-5					
6111 S WEATHERBY DR		Liquidation Company	\$1,594.51 (A) \$0.0) (A)	Classified Claim						
SHREVEPORT, LA 71129			\$0.00 ((P) \$0.0) (P)							
SHREVEFORT, LA /1129								\$0.00 (U) \$1,594.5	1 (U)		
Official Claim Date: 10/13/2009			\$1,594.51 (
Note: This claim arises from litigation against the Del expense pursuant to section 503(b)(9) of the Ba general unsecured claim.												
WATKINS, BRITNEY	16328	Motors	\$0.00 ((S) \$0.0) (S)	Incorrectly	Pgs. 1-5					
3844 BLAINE AVE		Liquidation Company	\$0.00 (A) \$0.0) (A)	Classified Claim						
SAINT LOUIS, MO 63110			\$2,275.00 ((P) \$0.0) (P)							
2.1.1. 200.5, 110 00.110			\$0.00 (U) \$2,275.0) (U)							
Official Claim Date: 10/26/2009			\$2,275.00 (T) \$2,275.0	(T)							
Note: This claim arises from litigation against the Del expense pursuant to section 503(b)(9) of the Ba general unsecured claim.			s, and it is not entitled a	ın administrative	. ,							
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim.	nkruptcy Code. Acc	cordingly, this clai	s, and it is not entitled a m should be reclassified	an administrative d as a non-priority,		Incorrectiv	Pgs. 1-5					
expense pursuant to section 503(b)(9) of the Ba general unsecured claim. WEHMEIER, LORETTA		Motors Liquidation	s, and it is not entitled a m should be reclassified \$0.00 (an administrative d as a non-priority, (S) \$0.0) (S)	Incorrectly Classified Claim	Pgs. 1-5					
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WEHMEIER, LORETTA 1707 WILLOW MILL DR	nkruptcy Code. Acc	cordingly, this clai	s, and it is not entitled a m should be reclassified \$0.00 (an administrative d as a non-priority, (S) \$0.0 A) \$0.0) (S)) (A)	Classified	Pgs. 1-5					
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WEHMEIER, LORETTA 1707 WILLOW MILL DR	nkruptcy Code. Acc	Motors Liquidation	s, and it is not entitled a m should be reclassified \$0.00 (\$0.00 (an administrative d as a non-priority, (S) \$0.0 A) \$0.0 (P) \$0.0	O) (S) O) (A) O) (P)	Classified	Pgs. 1-5					
	nkruptcy Code. Acc	Motors Liquidation	s, and it is not entitled a m should be reclassified \$0.00 (an administrative d as a non-priority, S) \$0.0 A) \$0.0 P) \$0.0 U) \$10,000.0) (S)) (A)) (P)) (U)	Classified	Pgs. 1-5					
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WEHMEIER, LORETTA 1707 WILLOW MILL DR MISSOURI CITY, TX 77489 Official Claim Date: 11/9/2009	22205	Motors Liquidation Company	\$0.00 (\$0.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (an administrative d as a non-priority, (S) \$0.0 (A) \$0.0 (P) \$0.0 (U) \$10,000.0 (T) \$10,000.0) (S)) (A)) (P)) (U)	Classified	Pgs. 1-5					
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WEHMEIER, LORETTA 707 WILLOW MILL DR MISSOURI CITY, TX 77489 Official Claim Date: 11/9/2009 Note: This claim arises from litigation against the Delexpense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WILLIAMS, NATHANIEL	22205	Motors Liquidation Company ed to priority statu cordingly, this clai	\$0.00 (\$0.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (an administrative d as a non-priority. (S) \$0.0 A) \$0.0 (P) \$0.0 U) \$10,000.0 T) \$10,000.0 an administrative d as a non-priority,) (S)) (A)) (P)) (U)	Classified Claim	Pgs. 1-5					
expense pursuant to section 503(b)(9) of the Bargeneral unsecured claim. WEHMEIER, LORETTA 1707 WILLOW MILL DR MISSOURI CITY, TX 77489 Official Claim Date: 11/9/2009 Note: This claim arises from litigation against the Delexpense pursuant to section 503(b)(9) of the Bargeneral unsecured claim. WILLIAMS, NATHANIEL	22205 btors. It is not entitle inkruptcy Code. According to the control of the c	Motors Liquidation Company	s, and it is not entitled a m should be reclassified \$0.00 (\$0.00 (\$10,000.00 (\$	an administrative d as a non-priority, (S) \$0.0 (A) \$0.0 (P) \$0.0 (U) \$10,000.0 (T) \$10,000.0 (an administrative d as a non-priority, (S) \$0.0) (S)) (A)) (P)) (U)) (T)	Classified Claim						
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WEHMEIER, LORETTA L707 WILLOW MILL DR MISSOURI CITY, TX 77489 Official Claim Date: 11/9/2009 Note: This claim arises from litigation against the Delexpense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WILLIAMS, NATHANIEL 5403 VOLUNTEER DRIVE	22205 btors. It is not entitle inkruptcy Code. According to the control of the c	Motors Liquidation Company ed to priority statu cordingly, this clai	s, and it is not entitled a m should be reclassified \$0.00 (\$0.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$5, and it is not entitled a m should be reclassified \$0.00 (an administrative d as a non-priority, (S) \$0.0 A) \$0.0 P) \$0.0 U) \$10,000.0 T) \$10,000.0 an administrative d as a non-priority, (S) \$0.0 A) \$0.0) (S) (A) (P) (U) (T) (T)	Classified Claim Incorrectly Classified						
expense pursuant to section 503(b)(9) of the Bageneral unsecured claim. WEHMEIER, LORETTA 1707 WILLOW MILL DR MISSOURI CITY, TX 77489 Official Claim Date: 11/9/2009 Note: This claim arises from litigation against the Delexpense pursuant to section 503(b)(9) of the Ba	22205 btors. It is not entitle inkruptcy Code. According to the control of the c	Motors Liquidation Company ed to priority statu cordingly, this clai	s, and it is not entitled a m should be reclassified \$0.00 (\$0.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$10,000.00 (\$50.00 (\$50.00 (\$50.00 (\$50.00 (\$50.00 (an administrative d as a non-priority, S) \$0.0 A) \$0.0 P) \$0.0 U) \$10,000.0 T) \$10,000.0 an administrative d as a non-priority, S) \$0.0 A) \$0.0 P) \$0.0) (S) (A) (P) (U) (T) (S) (A) (A) (A) (A) (A) (A) (A) (A) (A) (A	Classified Claim Incorrectly Classified						

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Twenty-Eighth Omnibus Objection

general unsecured claim.

Name and Address of Claimant	Claim #	Debtor	Claim Amount an Priority (1)	ıd	Modified Priority Status/Reduced Am		Grounds For Objection	Objection Page Reference
WINKELS, MEL	25299	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly	Pgs. 1-5
8854 MT HIGHWAY 200		Liquidation Company	\$0.00	(A)	\$0.00	(A)	Classified Claim	
WOLF CREEK, MT 59648			\$2,425.00	(P)	\$0.00	(P)		
WOEL CREEK, MT 55010			\$7,575.00	(U)	\$10,000.00	(U)		
Official Claim Date: 11/13/2009			\$10,000.00	(T)	\$10,000.00	(T)		
Note: This claim arises from litigation against the l expense pursuant to section 503(b)(9) of the general unsecured claim.								
WRIGHT, STEPHANIE	38875	Motors	\$0.00	(S)	\$0.00	(S)	Incorrectly	Pgs. 1-5
57 ALAMEDA ST		Liquidation Company	\$0.00	(A)	\$0.00	(A)	Classified Claim	
COCHESTER, NY 14613			\$20,140.00	(P)	\$0.00	(P)		
,			\$0.00	(U)	\$20,140.00	(U)		
				an adm		(T)		
Note: This claim arises from litigation against the l expense pursuant to section 503(b)(9) of the general unsecured claim.			s, and it is not entitled	an adm ed as a i	inistrative	(S)	Incorrectly Classified Claim	Pgs. 1-5
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. VYKEISHA BARBER 9080 DENTON RD APT #34	Bankruptcy Code. Acc	Motors Liquidation	s, and it is not entitled m should be reclassifie \$0.00	an adm ed as a i	sinistrative non-priority, \$0.00	(S)	Classified	Pgs. 1-5
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. WYKEISHA BARBER 19080 DENTON RD APT #34	Bankruptcy Code. Acc	Motors Liquidation	s, and it is not entitled m should be reclassifie \$0.00	an admed as a result of the control	sinistrative non-priority, \$0.00	(S) (A) (P)	Classified	Pgs. 1-5
	Bankruptcy Code. Acc	Motors Liquidation	s, and it is not entitled m should be reclassified \$0.00 \$0.00 \$3,100.00	an admed as a result of the control	so.00 \$0.00	(S) (A) (P) (U)	Classified	Pgs. 1-5
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. WYKEISHA BARBER 19080 DENTON RD APT #34 BELLEVILLE, MI 48111	Bankruptcy Code. Acc 64336 Debtors. It is not entitle	Motors Liquidation Company	s, and it is not entitled m should be reclassified \$0.00 \$0.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00	an adm ed as a r	\$0.00 \$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00	(S) (A) (P) (U)	Classified	Pgs. 1-5
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. WYKEISHA BARBER 9080 DENTON RD APT #34 BELLEVILLE, MI 48111 Official Claim Date: 11/30/2009 Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim.	Bankruptcy Code. Acc 64336 Debtors. It is not entitle	Motors Liquidation Company ed to priority statu cordingly, this clai	s, and it is not entitled m should be reclassified \$0.00 \$0.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00	an admed as a result of the control	\$0.00 \$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00	(S) (A) (P) (U) (T)	Classified Claim	Pgs. 1-5
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. WYKEISHA BARBER 9080 DENTON RD APT #34 BELLEVILLE, MI 48111 Official Claim Date: 11/30/2009 Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the	Bankruptcy Code. Acc 64336 Debtors. It is not entitle Bankruptcy Code. Acc	Motors Liquidation Company	\$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00 \$4, and it is not entitled m should be reclassified.	an admed as a result of the control	\$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00	(S) (A) (P) (U) (T)	Classified Claim	
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. WYKEISHA BARBER 9080 DENTON RD APT #34 BELLEVILLE, MI 48111 Official Claim Date: 11/30/2009 Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim.	Bankruptcy Code. Acc 64336 Debtors. It is not entitle Bankruptcy Code. Acc	Motors Liquidation Company ed to priority statu cordingly, this clai	\$0.00 \$0.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,000 \$3,	an admed as a result of the control	\$0.00 \$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00	(S) (A) (P) (U) (T)	Classified Claim Incorrectly Classified	
Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. WYKEISHA BARBER 9080 DENTON RD APT #34 BELLEVILLE, MI 48111 Official Claim Date: 11/30/2009 Note: This claim arises from litigation against the I expense pursuant to section 503(b)(9) of the general unsecured claim. COUNG, SHANNON 1115 LYONS AVE APT A	Bankruptcy Code. Acc 64336 Debtors. It is not entitle Bankruptcy Code. Acc	Motors Liquidation Company ed to priority statu cordingly, this clai	s, and it is not entitled m should be reclassified \$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00 \$3,100.00 \$3,100.00 \$0.00 \$0.00 \$0.00	an admed as a result of the control	\$0.00 \$0.00 \$0.00 \$3,100.00 \$3,100.00 sinistrative non-priority,	(S) (A) (P) (U) (T) (S) (A) (P)	Classified Claim Incorrectly Classified	

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09-50026-mg Doc 6251 Filed 07/02/10 Entered 07/02/10 17:03:57 Main Document Pg 20 of 20

Exhibit A

Twenty-Eighth Omnibus Objection

CLAIMS TO BE RECLASSIFIED									
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference			
Claim Totals	30		\$0.00 (S)	\$0.00 (S)					
			\$26,839.51 (A)	\$0.00 (A)					
			\$4,026,000.31 (P)	\$0.00 (P)					
			\$3,333,387.96 (U)	\$7,386,227.78 (U)					
			\$7,386,227.78 (T)	\$7,386,227.78 (T)					

⁽¹⁾ In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".